

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region I - EPA New England**

Drafted Date: August 1, 2012

Finalized Date: August 22, 2012

**SUBJECT:** Partial Compliance Evaluation of Buckeye Partners, Bangor, ME

**FROM:** Elizabeth Kudarauskas, Environmental Engineer, Air Technical Unit

**THRU:** Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit

**TO:** File

**I. Facility Information**

- A. Facility Name: Buckeye Partners, L.P.
- B. Facility Location: 730 Main Street, Bangor, ME 04401
- C. Facility Mailing Address: same
- D. Facility Contact: Edward Bielecki, Lead Terminal Operator
- E. Type of Source (major/minor/sm/sm80): SM80
- F. Date permit issued: March 17, 2011
- G. AFS #: 2301900091

**II Background Information**

- A. Date of inspection: July 31, 2012
- B. Weather Conditions: sunny, hot, temps in the 80's
- C. US EPA Representative(s):
  - Beth Kudarauskas, Air Tech Unit, OES
  - Mike Looney, OEME
  - Bill Osbahr, OEME
- D. State Representative(s): none
- E. Federally Enforceable Requirements Covered During the Inspection:
  - SM Permit
  - 40 CFR Part 60 Subpart XX
  - 40 CFR Part 63 Subpart R, if applicable
  - 40 CFR Part 60 Subpart K, if applicable
  - 40 CFR Part 63 Subpart Y, if applicable
  - 40 CFR Part 63 Subpart BBBBBB

**III Purpose of Inspection**

The purpose of this inspection was to evaluate applicability and compliance of the Buckeye Partners Terminal with respect to the Subpart BBBBBB MACT regulations. In addition, EPA conducted monitoring to determine whether excess VOC emissions were being emitted from the facility.

#### IV Facility Description

##### A. Company / Facility History

In Maine, Buckeye Partners, L.P. operates two terminals. The terminal at 730 Main Street is located in Bangor, ME and another terminal is located in Portland, ME.

The Buckeye Partners, LP purchased the terminal in Bangor, ME from ExxonMobil in July 2011.

At the same time, Buckeye entered into a 50/50 joint venture with Irving Oil Company to purchase a terminal in Portland, ME previously owned by ExxonMobil. Buckeye also purchased 124 miles of pipeline which connects the two Maine terminals.

##### B. Corporate Structure and CEO/President/owner name and mailing address

Buckeye Partners, L.P. is a publicly traded partnership that owns and operates one of the largest independent liquid petroleum products pipeline systems in the United States. Recently Buckeye has been expanding into different geographic areas as well as increasing the company's marine terminal presence. As of July 2011, Buckeye owned more than 100 liquid petroleum products terminals.

##### C. Number of Employees and Working Hours

Although the facility loading operations may be conducted 24 hours a day, 7 days a week, the facility is only staffed during normal business hours. Buckeye currently employs 2 people at the Bangor Terminal.

#### V Inspection

##### A. Entry

The EPA inspectors arrived unannounced at the Buckeye facility located on Main Street in Bangor, ME at 12:00 pm. The EPA inspectors (Ms. Kudarauskas, Mr. Osbahr and Mr. Looney) showed their credentials to Mr. Edward Bielecki, the Lead Terminal Operator. Ms. Kudarauskas explained that the purpose of the inspection was to evaluate compliance with air regulations.

Upon entry at the facility, Mr. Bielecki informed the inspectors that the Terminal Manager, Mr. Keith Moores was at the Portland, ME facility for the day. Mr. Moores is responsible for environmental compliance and keeping appropriate records. Mr. Bielecki further explained that the US Department of Transportation (US DOT) was on-site conducting an inspection of the terminal and pipeline and the Bangor Terminal was getting prepared for a shipment through the pipeline.

After discussion, it was decided that the EPA inspection would continue, however the EPA inspectors would make every effort to minimize the time spent on-site by asking questions during a facility tour instead of sitting down for a formal opening conference. Mr. Bielecki agreed that this approach would be acceptable and made a phone call to delay the pipeline transfer until after the EPA inspection.

The inspectors explained that in addition to the routine inspection they would be using some monitoring equipment to evaluate facility operations. Mr. Looney explained that he brought a forward looking infra-red (FLIR) camera with him to visually detect vapor leaks.

#### B. Facility Description and Walk Through

Mr. Bielecki stated that the Buckeye Terminal in Bangor does store and distribute gasoline. The facility has several gasoline storage tanks that are equipped with internal floating roofs and a gasoline loading rack.

The Bangor facility uses a vapor recovery unit (VRU) to control vapors. The ME DEP air permit issued to ExxonMobil for the Bangor facility requires that the VRU controls vapors to 35 mg/L. The permit also requires that the facility test the to demonstrate compliance with the limit once every other year. Mr. Bielecki stated that a continuous monitor had been installed on the VRU and the most recent stack test was conducted on December 2, 2012.

Mr. Bielecki led the inspectors to the pressure vacuum relief vent (PVRV) for the vapor recovery system. Mr. Looney and Mr. Osbahr used the FLIR camera and were able to see vapors being emitted from the PVRV. One truck was in Bay 1 at the loading rack loading gasoline and diesel when the PVRV was emitting.

In the same area as the PVRV, the inspectors observed a vapor line bypass valve. The venting was configured so that the gasoline vapors could be diverted to the atmosphere through a bypass instead of to the VRU. The valves to open and close the bypass were accessible from the ground with a pull chain. Mr. Bielecki stated that they bypass was never used and was likely a relic from an older system. Using the FLIR, Mr. Looney did not detect any vapors being emitted from the bypass.

The Buckeye Bangor terminal has three bays at the loading rack. Two of the bays (Bay 1 and Bay 3) are capable of loading gasoline. The inspectors observed several trucks loading in Bay 1 during the inspection.

Because the inspectors observed vapors being emitted from the PVRV, Mr. Osbahr discussed using pressure monitoring equipment on the loading rack to verify the pressure in the vapor line. Mr. Osbahr explained to Mr. Bielecki that if the vapor line is pressurized to a level greater than 18 inches water column, then the pressure could be causing the PVRV to release.

Mr. Osbahr connected his pressure monitoring equipment including a vapor line adaptor and U-tube manometer to two different trucks loading in Bay1 to measure pressure in the vapor line. Bay 1 is located the furthest from the PVRV and the VRU, which means that it has the greatest potential to have high pressure in the vapor line. The highest pressure observed during the monitoring was 3 inches of water.

While Mr. Osbahr was monitoring pressure, Mr. Looney was looking at the PVRV with the FLIR camera. The same leaks on the PVRV were observed with the FLIR camera.

From the loading rack Mr. Looney was able to observe with the FLIR some emissions coming from the top vents on Tank 20. Mr. Bielecki brought the inspectors to the tank farm. All the tanks at the Buckeye Bangor Terminal are connected by catwalks. Mr. Looney and Mr. Osbahr climbed the tanks in the tank farm to scan the facility with the FLIR for significant emission sources.

Mr. Bielecki listed the products stored at the Buckeye Bangor Facility. The table below summarizes the tank information.

<b>Buckeye Partners</b>				
<b>Tank ID</b>	<b>Vintage</b>	<b>Capacity</b>	<b>Tank Type</b>	<b>Product</b>
9	1913	478,380	Internal Floating Roof	PCBOB
11	1920	1,061,298	Internal Floating Roof	CBOB
16	1925	347,256	Internal Floating Roof	Ethanol
20	1972	967,050	Internal Floating Roof	CBOB
6	1895	253,456	Cone Roof Riveted	HSD #2
18	1917	183,498	Internal Floating Roof	Transmix
10	1920	373,669	Cone Roof Riveted	ULSD #2
19	1924	253,429	Cone Roof Riveted	ULSD #2
8	1913	1,027,804	Cone Roof Riveted	HSD #2

CBOB - Conventional Blendstock for Oxygenate Blending (regular gasoline without ethanol)

PCBOB – Premium Conventional Blendstock for Oxygenate Blending (premium gasoline without ethanol)

HSD #2 – High Sulfur #2 Diesel Fuel

ULSD #2 – Ultra Low Sulfur #2 Diesel Fuel

Transmix – an interface mixture of gasoline and diesel from the pipeline

The Buckeye Bangor facility receives all products via pipeline and sends them out in tanker trucks. The facility has a dock, however, all piping was removed from the dock many years ago and it is not currently used.

#### E. Closing Conference

The inspectors conducted a brief closing conference at the end of the inspection. Ms. Kudarauskas reiterated that the emissions from the PVRV were an issue that would need to be addressed. Also, the inspectors stated that the vapor line bypass was an issue of concern. Mr. Bielecki said that since the bypass is not used, the facility may decide to remove it completely from the system.

The inspectors thanked Mr. Bielecki for his time and left the facility at approximately 2:00 pm.